

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.  
Technologies, a California corporation;  
MOZILLA FOUNDATION, a California  
public benefit corporation; LAURA  
CHAMBERS and her marital community;  
WINIFRED MITCHELL BAKER and her  
marital community, and DANI CHEHAK and  
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

**PROPOSED ORDER ON JOINT  
LCR 37 MOTION REGARDING  
MOZILLA CORPORATION'S  
DISCOVERY REQUESTS TO  
PLAINTIFF**

**THIS MATTER** having come before the Court upon LCR 37 Submission Regarding Defendant Mozilla Corporation's Discovery Requests to Plaintiff, and the Court having reviewed the files and records herein, and being fully advised, **NOW THEREFORE,**

RFP 8: All medical records that refer to treatment for your alleged emotional distress, including psychiatric, psychological, or counseling records.

GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

RFP 9 to Plaintiff: All medical records from August 1, 2019 to August 1, 2022.

Plaintiff is ordered to produce medical records from two years prior to his diagnosis.

GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

RFP 10 to Plaintiff: All medical records from March 1, 2024 to May 23, 2024 that relate to your ability to return to work following your cancer treatment.

GRANTED \_\_\_\_\_ DENIED \_\_\_\_\_

The material compelled by this order must be produced within 14 days.

DATED \_\_\_\_\_, 2025

\_\_\_\_\_  
THE HONORABLE RICHARD A. JONES  
UNITED STATES DISTRICT COURT

*Presented by:*

DLA PIPER LLP (US)

By: /s/Anthony Todaro

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 1, 2025, I caused a true and correct copy of the foregoing document to be served on the parties listed below in the manner indicated:

|   |   |
|---|---|
| <p>Amy Alexander, WSBA # 44242<br/> Mathew L. Harrington, WSBA #33276<br/> Maricarmen Perez-Vargas, WSBA #54344<br/> STOKES LAWRENCE, P.S.<br/> 1420 Fifth Avenue, Suite 3000<br/> Seattle, WA 98101<br/> <a href="mailto:amy.alexander@stokeslaw.com">amy.alexander@stokeslaw.com</a><br/> <a href="mailto:mathew.harrington@stokeslaw.com">mathew.harrington@stokeslaw.com</a><br/> <a href="mailto:Maricarmen.Perez-Vargas@stokeslaw.com">Maricarmen.Perez-Vargas@stokeslaw.com</a><br/> <a href="mailto:sarah.armon@stokeslaw.com">sarah.armon@stokeslaw.com</a><br/> <a href="mailto:anna.armitage@stokeslaw.com">anna.armitage@stokeslaw.com</a><br/> <a href="mailto:laura.smith@stokeslaw.com">laura.smith@stokeslaw.com</a></p> <p><i>Attorneys for Plaintiff Steve Teixeira</i></p> | <p><input type="checkbox"/> Via Hand Delivery</p> <p><input type="checkbox"/> Via U.S. Mail</p> <p><input checked="" type="checkbox"/> Via E-mail</p> <p><input checked="" type="checkbox"/> Via the Court's E-Service Device</p> |
| <p>Daniel M. Weiskopf, WSBA # 44941<br/> Richard W. Redmond, WSBA # 58835<br/> MCNAUL EBEL NAWROT &amp; HELGREN PLLC<br/> 600 University St Ste 2700<br/> Seattle, WA 98101<br/> <a href="mailto:dweiskopf@mcnaul.com">dweiskopf@mcnaul.com</a><br/> <a href="mailto:redmond@mcnaul.com">redmond@mcnaul.com</a><br/> <a href="mailto:Tdo@mcnaul.com">Tdo@mcnaul.com</a><br/> <a href="mailto:mmonkress@mcnaul.com">mmonkress@mcnaul.com</a><br/> <a href="mailto:jhickman@mcnaul.com">jhickman@mcnaul.com</a></p> <p><i>Attorneys for Defendant Winifred Mitchell Baker</i></p>   | <p><input type="checkbox"/> Via Hand Delivery</p> <p><input type="checkbox"/> Via U.S. Mail</p> <p><input checked="" type="checkbox"/> Via E-mail</p> <p><input checked="" type="checkbox"/> Via the Court's E-Service Device</p> |

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*Attorneys for Defendant Mozilla  
Foundation*

- ☐ Via Hand Delivery  
☐ Via U.S. Mail  
☒ Via E-mail  
☒ Via the Court's  
E-Service Device

I declare under penalty of perjury under the laws of the state of Washington that the foregoing is true and correct.

Dated this 1st day of May, 2025.

s/ Jacey Bittle  
Jacey Bitte, Legal Executive Assistant